

1 PATRICK J. CRONIN, WSBA #28254
2 BENJAMIN H. RASCOFF, WSBA #45197
3 WINSTON & CASHATT, LAWYERS
4 601 W. Riverside, Ste. 1900
5 Spokane, WA 99201
6 Telephone: (509) 838-6131
7 Facsimile: (509) 838-1416
8 Email: pjc@winstoncashatt.com
9 Email: bhr@winstoncashatt.com

7 Attorneys for Defendants Kaiser Aluminum
8 Washington, LLC and Kaiser Aluminum
9 Fabricated Products, LLC

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 MICHELLE ANDERSON, an individual,

No.

13 Plaintiff,

14 vs.

AFFIDAVIT OF PATRICK J. CRONIN
15 IN SUPPORT OF NOTICE OF
16 REMOVAL

17 KAISER ALUMINUM WASHINGTON,
18 LLC, a foreign corporation doing business
19 in the State of Washington; KAISER
20 ALUMINUM FABRICATED
PRODUCTS, LLC, a foreign corporation
doing business in the State of Washington;
"JOHN DOE I-V" employees, agents,
and/or independent contractors of KAISER
ALUMINUM WASHINGTON, LLC
and/or KAISER ALUMINUM
FABRICATED PRODUCTS, LLC; and

21
22
23
24 AFFIDAVIT OF PATRICK J. CRONIN IN SUPPORT
OF NOTICE OF REMOVAL
PAGE 1

Winston & Cashatt
A PROFESSIONAL SERVICE CORPORATION
1900 Bank of America Financial Center
601 West Riverside
Spokane, Washington 99201
(509) 838-6131

1 "UNKNOWN BUSINESS ENTITIES I-
2 V", jointly and severally,
3 Defendants.

4 STATE OF WASHINGTON)
5 COUNTY OF SPOKANE) : ss.
6

7 PATRICK J. CRONIN, being first duly sworn, upon oath deposes and says:

8 1. I represent the defendants Kaiser Aluminum Washington, LLC and
9 Kaiser Aluminum Fabricated Products, LLC in this action.

10 2. I have reviewed the Complaint filed by the plaintiff, which includes a
11 claim for damages for injuries suffered by the plaintiff, as well as prejudgment
12 interest, attorney fees, and costs.

13 3. Plaintiff's counsel has stated in writing that plaintiff Michelle
14 Anderson's claim for damages exceeds \$2 million.



15
16
17 PATRICK J. CRONIN
18

19 SUBSCRIBED AND SWORN to before me this 1st day of June, 2021.



NOTARY PUBLIC in and for the State
of Washington, residing at Spokane Valley
My commission expires: 5-1-23

AFFIDAVIT OF PATRICK J. CRONIN IN SUPPORT
OF NOTICE OF REMOVAL
PAGE 2

Winston & Cashatt
A PROFESSIONAL SERVICE CORPORATION
1900 Bank of America Financial Center
601 West Riverside
Spokane, Washington 99201
(509) 838-6131

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2021, I caused the foregoing to be served on the following parties in the manner indicated:

Matthew F. Duggan
GLP Attorneys, P.S., Inc.
601 W. Main Ave., Suite 305
Spokane, WA 99201

VIA REGULAR MAIL
VIA CERTIFIED MAIL
HAND DELIVERED
BY FACSIMILE
VIA EMAIL

Attorney for Plaintiff

s/Patrick J. Cronin

PATRICK J. CRONIN, WSBA #28254
BENJAMIN H. RASCOFF, WSBA #45197
WINSTON & CASHATT, LAWYERS
Attorneys for Defendants Kaiser Aluminum
Washington, LLC and Kaiser Aluminum
Fabricated Products, LLC
601 W. Riverside, Ste. 1900
Spokane, WA 99201
Telephone: (509) 838-6131
Facsimile: (509) 838-1416
Email: pjc@winstoncashatt.com
Email: bhr@winstoncashatt.com

AFFIDAVIT OF PATRICK J. CRONIN IN SUPPORT
OF NOTICE OF REMOVAL
PAGE 3

Winston & Cashatt
A PROFESSIONAL SERVICE CORPORATION
1900 Bank of America Financial Center
601 West Riverside
Spokane, Washington 99201
(509) 838-6131